

REMARKS

Applicants respectfully traverse and request reconsideration.

Applicants thank the Examiner for notice that claims 5 and 17–18 are allowable over the cited prior art.

Claims 1, 3–4, 7–16, and 19–20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,740,352 to Philipp et al. (“Philipp”) in view of U.S. Patent No. 6,924,796 to Someya et al. (“Someya”). Applicants respectfully submit that the Action ignores explicit claim language directed to (1) “converting the display signal into at least one data acquisition signal having a pixel clock signal” as presented in claims 1 and 9; and (2) “a data acquisition signal including at least a pixel clock signal generated by the printed circuit board from the display signals” as presented in claims 14 and 19. (Emphasis added).

Applicants respectfully note that the Office has failed to provide a *prima facie* case of obviousness as required by MPEP § 2142. “To establish a *prima facie* case of obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. All words in a claim must be considered in judging the patentability of that claim against the prior art.” (MPEP § 2143.03, citation to case law omitted). As previously identified, the Action wholly fails to address explicit claim language directed toward the data acquisition signal having or including a pixel clock signal. Applicants further note that the references do not appear to teach or suggest, alone or in combination, these limitations. Accordingly, the claims are in proper condition for allowance for this reason alone.

Additionally, no combination of Philipp and Someya teaches or suggests “taking time interval measurements of the at least one data acquisition signal, wherein at least one time interval measurement is based on the pixel clock signal.” Accordingly, it is respectfully submitted that the Action fails to articulate a proper *prima facie* case of obviousness for this

reason as well. Applicants respectfully agree with the Office that Philipp fails to teach or suggest “taking time interval measurements of the at least one data acquisition signal.” While the Examiner points to Someya as teaching or suggesting this limitation, Applicants respectfully note that the cited portion of Someya is merely directed toward detecting the phase difference between a dot clock and a digital image signal. Because the digital image signal does not appear to be related to the dot clock signal (i.e., the image signal does not have or include the dot clock signal), the claim limitation is not taught or suggested. For instance, the dot clock is generated by PLL 102 based on an HSYNC signal and does not appear to be related to the digital or analog image signal that is provided to the system along what appears to be a separate input port. Because the digital image signal does not appear to be related to the dot clock signal, the position taken by the present Action is untenable for at least the reason that the data acquisition signal must have or include the pixel clock signal. Thus, because Someya fails to describe any relationship between the digital image signal and the dot clock, the cited prior art fails to render obvious this limitation.

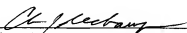
For at least the reason that multiple claim limitations are not taught or suggested by the combination of the cited prior art, the Action fails to provide the necessary *prima facie* case of obviousness. Accordingly, claims 1, 9, 14, and 19 are presented for immediate allowance. If the rejections are maintained, Applicants respectfully ask that any subsequent paper mailed by the Office be a nonfinal action addressing all claim limitations.

Claims 3–4, 7–8, 10–13, 15–16, and 20 depend upon allowable subject matter and further add additional novel and nonobvious subject matter. For at least these reasons, claims 3–4, 7–8, 10–13, 15–16, and 20 are further believed to be allowable over the cited prior art.

Applicants respectfully submit that the claims are in condition for allowance and respectfully request that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

Date: 4/26/06

By: 
Christopher J. Reckamp
Registration No. 34,414

Vedder, Price, Kaufman & Kammholz, P.C.
222 North LaSalle Street, Suite 2600
Chicago, Illinois 60601
phone: (312) 609-7599
fax: (312) 609-5005